

Exhibit “A”

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Attorney for Plaintiff(s)  
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<b>GARY BOLYER AND DENISE JONES</b>	:	<b>SUPERIOR COURT OF NEW JERSEY</b>
	:	
	:	<b>CIVIL DIVISION</b>
	:	<b>ESSEX COUNTY</b>
	:	
<b>VERSUS</b>	:	<b>DOCKET NO.:</b>
	:	
	:	
	:	<b><u>CIVIL ACTION</u></b>
	:	
<b>GREYHOUND LINES, INC.</b>	:	
	:	
	:	<b><u>COMPLAINT AND JURY DEMAND</u></b>

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The Complaint of Gary Bolyer and Denise Jones, both residents of and domiciled in Bienville Parish, Louisiana, with respect represent:

1.

The Defendant enumerated below is justly and truly indebted to Plaintiffs for a reasonable sum in dollars together with legal interest from the date of judicial demand until paid and for all costs of these proceedings:

- a. GREYHOUND LINES, INC. (hereinafter "Greyhound") a foreign corporation authorized to do and doing business in New Jersey, which can be served through its registered agent and office, The Corporation Trust Company, 820 Bear Tavern Road, West Trenton, New Jersey 08628

2.

On or about November 4, 2019, Margaret Shaw was driving a Greyhound Bus (VIN 1M8PDMRA7YP052672), owned by Greyhound Lines, in an eastbound direction on Edison Place, toward its intersection with Alling Street, in Newark, New Jersey.

3.

At all times relevant hereto, Margaret Shaw was an agent or employee of Greyhound, and the actions of Margaret Shaw arose out of and were during the course and scope of her employment with Greyhound.

4.

On or about November 4, 2019, Gary Bolyer and Denise Jones were traveling home from New York to Louisiana as passengers in the Greyhound Bus (VIN 1M8PDMRA7YP052672) owned by Greyhound and operated by Margaret Shaw.

5.

As Margaret Shaw drove the Greyhound Bus eastbound on Edison Place, she attempted to drive the bus under the Amtrak bridge at the intersection of Edison Place and Alling Street.

6.

The Greyhound Bus was too large to clear the Amtrak bridge at the intersection of Edison Place and Alling Street.

7.

Because the Greyhound Bus was too large, it slammed into the Amtrak Bridge at the intersection of Edison Place and Alling Street.

8.

The Greyhound Bus, Model 102-DL3, being operated by Margaret Shaw was built in the year 2000 and did not contain seatbelts.

9.

Because the Greyhound Bus did not contain seatbelts, the force of the collision threw Denise and Gary into the seats directly in front of them.

10.

The collision sued on herein was caused by the negligence of the defendant, Greyhound, and its driver, Margaret Shaw, which includes, but is not limited to the following:

- A. Failure to schedule a safe bus route;
- B. Failure to keep a proper lookout;
- C. Failure to observe or comply with signs and signals relative to vehicle and/or bridge height;
- D. Driving in an improper, imprudent, or careless manner;
- E. Failure to avoid the collision sued on herein;
- F. Failure to see what should have been seen;
- G. Failure to take proper precautionary measures;
- H. Failure to break

11.

Margaret Shaw was cited by the New Jersey Transit Police for careless operation, in violation of N.J.S.A. 39:4-97, in connection with the wreck.

12.

As a result of the collision sued on herein, Denise Jones received injuries about her body, which include, but are not limited to, the following:

- A. Traumatic Brain Injury;
- B. Pain and injuries to her back;
- C. Decreased range of motion due to pain and injuries in her back; AND
- D. Other injuries that will be proven at trial.

13.

As a result of the collision and injuries received therefrom, Denise Jones sustained damages, which include, but are not limited to, the following:

- A. Past medical bills;
- B. Future medical bills;
- C. Past mental and physical pain and suffering;
- D. Future mental and physical pain and suffering;
- E. Permanent disability
- F. Psychological damage and depression; AND
- G. Loss of enjoyment of life.

14.

As a result of the collision sued on herein, Gary Bolyer received injuries about his body, which include, but are not limited to, the following:

- A. Pain and injuries to his ankle;
- B. Pain and injuries to his foot;
- C. Decreased range of motion due to pain and injuries in his ankle and foot;
- D. Decreased ability to walk due to pain and injuries in his ankle and foot;

- E. Other injuries that will be proven at trial.

15.

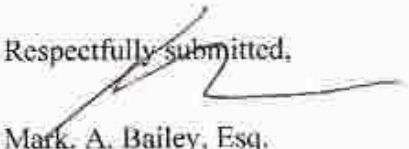
As a result of the collision and injuries received therefrom, Gary Bolyer sustained damages, which include, but are not limited to, the following:

- A. Past medical bills;
- B. Future medical bills;
- C. Past mental and physical pain and suffering;
- D. Future mental and physical pain and suffering;
- E. Permanent disability
- F. Psychological damage and depression; AND
- G. Loss of enjoyment of life.

WHEREFORE, PLAINTIFFS PRAY:

1. That there be judgment in favor of plaintiffs, Gary Bolyer and Denise Jones, and against defendant, Greyhound, together with all legal interest from date of judicial demand until paid, and all costs for these proceedings;
2. That any expert witness fees be fixed and taxed as costs;
3. For all general, necessary, and equitable relief;
4. For a trial by jury on all issues so triable.

Respectfully submitted,

  
Mark A. Bailey, Esq.



Attorney for Plaintiff

BY: 

Mark A. Bailey, Esq.

Dated: October 15, 2020

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury on all issues.

BY: 

Mark A. Bailey, Esq.

Dated: October 15, 2020

**DESIGNATION OF TRIAL COUNSEL**

Plaintiff hereby designates Mark A. Bailey, Esq. as trial counsel in the above-captioned case. Let it be known that Plaintiffs' Louisiana counsel has filed a contemporaneous motion to be admitted pro hac vice alongside Mark A. Bailey who is serving as local counsel.

BY: 

Mark A. Bailey, Esq.

Dated: October 15, 2020

**CERTIFICATION OF COMPLIANCE PURSUANT TO R. 1:38-7(C)**

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

BY: 

Mark A. Bailey, Esq.

Dated: October 15, 2020

**CERTIFICATION OF SERVICE**

The undersigned certifies that a true copy of the foregoing pleading was duly filed with the clerk, Superior Court of Essex County and that a copy was served upon the attorney for the Defendant at:

GREYHOUND LINES, INC.  
through its registered agent for service of process:  
The Corporation Trust Company  
820 Bear Tavern Road  
West Trenton, New Jersey 08628



Mark A. Bailey, Esq.

Dated: 10/15/ 2020



## Civil Case Information Statement

### Case Details: ESSEX | Civil Part Docket# L-006931-20

**Case Caption:** BOLYER GARY VS GREYHOUND LINES, INC

**Case Initiation Date:** 10/15/2020

**Attorney Name:** MARK ANTHONY BAILEY

**Firm Name:** MARK BAILEY ATTORNEY AT LAW

**Address:** 569 DR MLK BLVD

NEWARK NJ 07102

**Phone:** 8666685058

**Name of Party:** PLAINTIFF : BOLYER, GARY

**Name of Defendant's Primary Insurance Company**

(if known): Unknown

**Case Type:** PERSONAL INJURY

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 6 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Are sexual abuse claims alleged by: GARY BOLYER?** NO

**Are sexual abuse claims alleged by: DENISE JONES?** NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

10/15/2020  
Dated

/s/ MARK ANTHONY BAILEY  
Signed

